

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SOO LINE RAILROAD CO.)	
d/b/a CANADIAN PACIFIC RAILWAY)	
)	
Plaintiff,)	
)	Civil Action No. 08-CV-1813
v.)	Judge Der-Yeghiayan
)	Magistrate Judge Cox
)	
BROTHERHOOD OF MAINTENANCE OF WAY)	
EMPLOYES DIVISION OF THE INTERNATIONAL)	
BROTHERHOOD OF TEAMSTERS)	
)	
Defendant.)	
)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE
RESPOND TO THE COMPLAINT AND RESET INITIAL STATUS HEARING
AND STATEMENT IN SUPPORT THEREOF**

The Brotherhood of Maintenance of Way Employes Division/IBT (“BMWED ” or “Union”) hereby moves the Court for a fifteen (15) day extension of BMWED’s time to answer or otherwise respond to the complaint of plaintiff Soo Line Railroad Co. (“Soo”). BMWED respectfully submits that the requested extension is necessary because of work and personal commitments of its lead counsel, Richard S. Edelman; and BMWED notes that the extension is not opposed by the plaintiff. Furthermore, because granting this motion would mean that BMWED’s response would be filed after the new date set for the initial status hearing, BMWED also submits that the status hearing should rescheduled for a date after the filing of BMWED’s response.

Based upon mail service of the complaint, an answer or other response from BMWED is currently due on June 2, 2008. However, Mr. Edelman has been heavily involved in certain active legislative matters, a national Postal Service arbitration, a two week interest arbitration and a case with a pending motion for a preliminary injunction that is scheduled to be heard on June 9, 2008: *Hicks v National Postal Professional Nurses* (D MD 07-CV-3044). Additionally, Mr. Edelman's son will be graduating college the weekend of May 23-26, 2008 and Mr. Edelman's daughter will become bat mitzvah on June 7, 2008; both family events have consumed a significant amount of Mr. Edelman's time in recent weeks and will continue to do so through June 8, 2008. BMWED therefore requests that it be granted an additional 15 days, until June 17, 2008 to answer or otherwise respond to the complaint in this case and that the initial status hearing be rescheduled for after June 17.

Counsel for BMWED has contacted counsel for the Soo, and counsel for the Soo has graciously authorized counsel for BMWED to represent that the Soo does not object to this extension.

For all the foregoing reasons, BMWED respectfully requests that this motion be granted and that BMWED's time to answer or otherwise respond to the complaint be extended to and including June 17, 2008 and that the initial status hearing be rescheduled for after June 17.

Respectfully submitted,

Of Counsel:

William A. Bon, Esq.

General Counsel

Brotherhood of Maintenance

Of Way Employes Division/IBT

20300 Civic Center Dr. Suite 320

Southfield, MI 48076-4169

(248) 948-1010

Richard S. Edelman

O'Donnell, Schwartz & Anderson, P.C.

1900 L Street, N.W., Suite 800

Washington, DC 20036

Telephone: (202) 898-1824

Facsimile: (202) 429-8928

REdelman@odsalaw.com

s/ William L. Phillips

William L. Phillips

Attorney at Law

100 N. LaSalle St. Suite 1605

Chicago, IL 60602

Telephone: (847) 644-1901

Facsimile: (312) 332-9595

bill@wlphillips.com

May 22, 2008

Attorneys for Defendant

Brotherhood of Maintenance of Way Employes

Division/IBT

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2008, a copy of the foregoing Answer was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this document through the Court's system.

s/ William L. Phillips